

EXHIBIT NO. 21

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

VIVIAN BERT, et al.,)	
)	
Plaintiffs,)	
)	
v.)	CASE NO. C-1-02-467
)	Judge Sandra Beckwith
AK STEEL CORPORATION,)	Magistrate Judge Timothy Hogan
)	
Defendant.		

AFFIDAVIT OF ROBERT F. CHILDS, JR.

Comes now Robert F. Childs, Jr., who being duly sworn, deposes and states as follows:

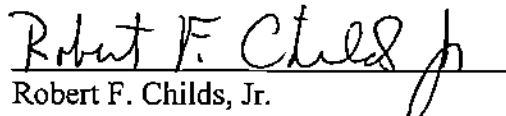
1. I am over the age of 18 and make this affidavit based on my own personal knowledge.
2. I am a shareholder and attorney at Wiggins, Childs, Quinn & Pantazis ("WCQP"), an employment and civil rights litigation law firm with offices in Birmingham, Alabama and Washington, D.C. WCQP, which has been in existence since 1985, is one of the largest, if not the largest, plaintiffs employment and civil rights law firms in the United States with over 40 attorneys involved in the day-to-day litigation of numerous individual and class actions, including claims of race, sex, age, disability, religion, and national origin discrimination, harassment and retaliation.
3. Herman N. (Rusty) Johnson, Jr. served as a law clerk for the Honorable Martha Craig Daughtrey, U.S. Court of Appeals for the Sixth Circuit, and the Honorable Myron H. Thompson, U.S. District Court for the Middle District of Alabama, during which he was assigned several class action cases and issues.
4. Mr. Johnson and I are the WCQP attorneys working on the case at bar. We have over 39 combined years of experience in litigating employment discrimination class actions at the district court

and appellate levels.¹ Indeed, we have litigated numerous major class actions over the years which have achieved substantial remedies for our clients in the employment discrimination arena. A list of some of the employment discrimination class actions, which have been, or are being, litigated by the attorneys in this case is attached hereto as Exhibit "A".

5. Because of our years of experience in handling employment discrimination class actions, the attorneys handling this case have knowledge of the applicable laws in this area and are clearly qualified, experienced and generally able to conduct the litigation of this case. Moreover, because of its size, years of experience and financial relationships, WCQP has the financial resources to litigate this class action.

6. Plaintiffs' counsel have worked diligently to identify and investigate the class action claims. We have propounded written discovery to the defendant regarding the application process at AK Steel and reviewed and organized thousands of applications and documents produced by the defendant in response to our written discovery. We have conducted Fed. R. Civ. P. 30(b)(6) depositions of defendant's corporate representatives to ascertain the hiring procedure of AK Steel. Our work as class counsel also included the selecting and engaging of plaintiffs' expert, Dr. Edwin Bradley, to prepare and file expert reports pinpointing the step in defendant's hiring procedure that caused a disproportionate impact upon African-American candidates. Furthermore, we have researched and filed three briefs related to the class certification issues in this case.

¹Robert F. Childs, Jr. has specialized in employment class actions since 1972 (over 34 years) and Herman N. Johnson, Jr. since 2001 (over 5 years).


Robert F. Childs, Jr.
Attorney for Plaintiff and Putative Class

SWORN TO and SUBSCRIBED before me
this the 21st day of June, 2006.


NOTARY PUBLIC

My Commission Expires: **NOTARY PUBLIC STATE OF ALABAMA AT LARGE**
MY COMMISSION EXPIRES: May 16, 2009
BONDED BY: ALABAMA NOTARY PUBLIC WRITERS

EXHIBIT "A"

Employment Class Actions Litigated By Lead Attorneys

1. Pettway, et al. v. ACIPCO
2. Cox, et al. v. ACIPCO
3. McConnell, et al. v. Alabama Federal/Secor Bank
4. Abdallah, et al. v. Coca Cola
5. Kircus, et al. v. Winn-Dixie
6. Moore, et al. v. Norfolk Southern Railroad
7. Williams, et al. v. CSX Transportation
8. U.S.A. v. U.S. Steel
9. Osley, et al. v. Handy City
10. Walker, et al. v. State of Alabama, et al.
11. Stowe, et al. v. Birmingham Cable
12. Jones, et al. v. Firestone Tire & Rubber Company
13. Kelly, et al. v. Bridgestone/Firestone, Inc.
14. Rice, et al. v. Long John Silver's
15. Celestine, et al. v. Citgo Petroleum Corporation
16. In re Employment Discrimination Litigation Against the State of Alabama
17. Samudio, et al. v. Alrengo
18. Robinson, et al. v. Boeing
19. Thorton, et al. v. Gayfer's Montgomery Fair Co.

20. Daniels, et al. v. Fontaine Fifth Wheel
21. Bice, et al. v. Holnam
22. Brown, et al. v. The Equitable Life Assurance Society
23. Butler, et al. v. Matsushita Communications Ind. Corp.
24. Reynolds, et al., v. Alabama Department of Transportation
25. Campbell, et al. v. Amtrak
26. Alexander, et al. v. Bush Hog
27. Strong, et al. v. U.S. Pipe
28. Bean, et al. v. Goody's Family Clothing, Inc.
29. Drake, et al. v. PPG Industries, Inc.
30. Clemmons, et al. v. Cooker Restaurant Corp.
31. Bert, et al. v. AK Steel Corporation
32. Barnes, et al. v. Canadian National Railroad
33. Douglas Powers, et al. v. Department of Transportation
34. Yapp, et al. v. Union Pacific Railroad
35. Allen, et al., v. International Truck and Engine Corporation
36. Smith, et al. v. U.S. Steel Corporation
37. Rhodes, et al. v. Cracker Barrel Old Country Store, Inc.
38. Carl Wright et al. v. South Central Bell
39. John Doe, et al. v. Nestle, S.A., et al.
40. John Doe, et al. v. Wal-Mart Stores, Inc.